

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re:	§	Chapter 11
	§	
KRISJENN RANCH, LLC,	§	Case No. 20-50805
	§	
Debtor.	§	
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KRISJENN RANCH, LLC and	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE	§	
ROW as successors in interest to	§	
BLACKDUCK PROPERTIES, LLC,	§	
	§	
Plaintiffs	§	
	§	
v.	§	
	§	
DMA PROPERTIES, INC., and	§	
LONGBRANCH ENERGY, LP,	§	Adversary No. 20-05027
	§	
Defendants	§	
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DMA PROPERTIES, INC.	§	
	§	
Cross-Plaintiff/Third Party Plaintiff	§	
	§	
v.	§	
	§	
KRISJENN RANCH, LLC,	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE ROW.	§	Adversary No. 20-050207
BLACK DUCK PROPERTIES, LLC,	§	
LARRY WRIGHT, and JOHN TERRELL,	§	
	§	
Cross-Defendants/Third-Party Defendants.	§	

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, KRISJENN RANCH, LLC-SERIES PIPELINE ROW'S
AGREED MOTION TO RESET HEARING ON MOTION TO
ENFORCE CONSTRUCTIVE TRUST**

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors” or “KrisJenn”) hereby file this Unopposed Motion to Reset Hearing on the Motion to Enforce Constructive Trust Filed by Austin Hammer Krist for Third Pty Plaintiff DMA Properties, Inc. an in support of this Motion, KrisJenn respectfully represents as follows:

1. On January 9, 2025, Third Party Plaintiff, DMA Properties, Inc. (“DMA”) filed a Motion to Enforce Constructive Trust (the “Motion”) [Dkt. No. 368].

2. On January 10, 2025 this Court set the Motion to be heard February 4, 2025 at 10:00 a.m. [Dkt. No. 369].

3. Counsel for KrisJenn is scheduled to be in a deposition for another matter on February 4, 2025, at 9:00 a.m. and will be unable to attend the hearing.

4. Counsel for KrisJenn has conferred with DMA, and they are agreeable to rescheduling the hearing on the condition that it is scheduled for the same week as currently set.

5. Based on the above issue, KrisJenn requests the Court reset the hearing to February 5, 2025 or February 7, 2025.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully request that the Court enter an Order resetting the hearing and grant Debtors all other relief they are justly entitled

Respectfully submitted,

CJ MULLER & ASSOCIATES, PLLC

By: /s/ John Muller

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ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 15th day of January 2025:

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